

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

DAVITA M. KEY, )  
                        )  
Plaintiff,         )  
                        )  
v.                     ) Case No. 2:19-CV-767-ECM  
                        )  
HYUNDAI MOTOR        )  
MANUFACTURING, ALABAMA, )  
LLC; HYUNDAI ENG AMERICA, )  
INC.; and DYNAMIC SECURITY, )  
INC.                     )  
                        )  
Defendants.         )

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**EXHIBIT “D” TO**

**PLAINTIFF’S OBJECTIONS TO DYNAMIC SECURITY INC.’S  
DEPOSITION DESIGNATIONS**

**CASSANDRA WILLIAMS**

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Case	Key, Davita
Issue Code	Dynamic Designation

WILLIAMS, CASSANDRA 9/6/22 VOL 1			
1	043:13 - 044:02	043:13       Q.   When we look at the first page of 14   Exhibit 9, HEA, and we look under "Female 15   Officers" where it says "Hair" and we see the last 16   three bullets, and it says, "Braids are permitted 17   but must be well groomed and kept. Dreads or 18   dreadlocks hair style are prohibited. Hair 19   ribbons are not permissible." 20                  Did any of that information come from the 21   HMMA policy? 22                  MS. BROWN: Object to form. 23                  A.   The last bullet?  ALABAMA COURT REPORTING, INC. www.alabamareporting.com   877.478.DEPO (3376)	
		044:01       Q.   The hair ribbons? 02       A.   Yes.	
2	051:10 - 051:23	051:10       Q.   What was Ms. Howard's race? 11       A.   Black. 12       Q.   An what was Ms. Walton's race? 13       A.   Miss who? 14       Q.   Walton. 15       A.   Black. 16       Q.   Is there still an "Appearance Standards 17   for Security Personnel" policy? 18       A.   Yes. 19       Q.   And under that are dreads or dreadlocks 20   prohibited for women? 21       A.   Yes. For women? 22       Q.   Yes. 23       A.   For all.	
3	084:11 - 084:19	084:11       Were you a party to this agreement 12   concerning how Ms. Key would style her hair? 13       A.   Yes. I was in there when she agreed to do 14   it. 15       Q.   Tell me what you know of that agreement. 16       A.   It was a verbal agreement. She stated -- 17   after I said "Yes, this is acceptable" and she	

		<p>18 stated that's the way she would have her hair done      19 when she returned.</p>
4	090:07 - 092:18	<p>090:07 Q. Right. Has anyone from HMMA expressed a      08 concern to you or to HEA about security not      09 exhibiting a professional appearance?</p> <p>10 MS. BROWN: Object to form.</p> <p>11 A. I have -- that has been brought to my      12 attention a couple of times maybe by a team      13 member. But as to say who it was and when it was,      14 it's has been brought several times.</p> <p>15 Q. And when you say "brought by a team      16 member," what does that phrase "team member" mean?</p> <p>17 A. An HMMA team member.</p> <p>18 Q. Is that the phrase that's used -- like, at      19 Disney, if somebody works for Walt Disney, they're      20 called a cast member, and that's the reference      21 they use for an employee.</p> <p>22 Is team member the phrase that you're      23 using to identify somebody who is employed</p> <p style="text-align: center;">ALABAMA COURT REPORTING, INC.  <a href="http://www.alabamareporting.com">www.alabamareporting.com</a> 877.478.DEP0 (3376)</p> <p>091:01 directly with HMMA?</p> <p>02 A. I use that occasionally with -- well, a      03 lot of times with HMMA. But if I'm talking about      04 one of the other suppliers -- Mobis, team members;      05 Glovis Alabama, team members -- I'll refer to them      06 as the -- the same way.</p> <p>07 Q. What's the difference between a team      08 member and somebody who works in security or in      09 the mail room?</p> <p>10 MR. MILLER: Object to the form.</p> <p>11 A. You can call them a team member, but      12 they're a team member with the security company.      13 But that's not the way I refer to them.</p> <p>14 Q. In the times that you've said a team      15 member has expressed to you concerns over the      16 professional appearance of security, have any of      17 those concerns related to hairstyles?</p> <p>18 MS. BROWN: Object to form.</p> <p>19 MR. MILLER: Object to form.</p> <p>20 A. A length of a hair style.</p> <p>21 Q. Was somebody --</p>

		<p>22 A. The bulk of a hair style.</p> <p>23 Q. <b>What was the complaint about the length of ALABAMA COURT REPORTING, INC.</b></p> <p><b>www.alabamareporting.com 877.478.DEPO (3376)</b></p> <p>092:01 a hairstyle?</p> <p>02 A. So security personnel should be able to</p> <p>03 properly fit their hair under a bump or a hard hat</p> <p>04 if they should go in the weld shop. And on the</p> <p>05 particular occasion related to the bulk of the</p> <p>06 hair, it was like -- based on how it was described</p> <p>07 to me, it was just, like, lopsided on their head,</p> <p>08 and that's not protecting that's person's head.</p> <p>09 As far as the length, the braids were,</p> <p>10 like, well down past the -- where I was allowing</p> <p>11 it. And, of course, if they go in the production</p> <p>12 area around the machinery, they could easily get</p> <p>13 their hair caught in the machine if they're not</p> <p>14 paying attention.</p> <p>15 Q. <b>Would it be fair to say, then, the</b></p> <p>16 <b>complaints you remember about hairstyles related</b></p> <p>17 <b>to safety concerns?</b></p> <p>18 A. Yes.</p>
5	095:01 - 095:02	<p>095:01 Q. <b>Which came first, the email or the verbal</b></p> <p>02 <b>communication to Gloria Robinson?</b></p>
6	135:03 - 135:07	<p>135:03 Q. <b>Do you remember if the -- I'm assuming it</b></p> <p>04 <b>was a lady that replaced Ms. Key?</b></p> <p>05 A. It was.</p> <p>06 Q. <b>Okay. And what was her race?</b></p> <p>07 A. Black.</p>
7	137:04 - 138:03	<p>137:04 Dynamic Security, Inc., here today. A minute ago</p> <p>05 you said something, if I understood your testimony</p> <p>06 right, that you thought Dynamic should have</p> <p>07 reported to you if they had done any investigation</p> <p>08 of Ms. Key's complaint?</p> <p>09 Did I understand your testimony to be</p> <p>10 that?</p> <p>11 A. Yes. If my name was mentioned in it, yes,</p> <p>12 since...</p> <p>13 Q. <b>Is there some specific contractual</b></p> <p>14 <b>language that you're relying on to say that they</b></p> <p>15 <b>should have told you?</b></p> <p>16 A. No.</p>

		<p>17 Q. I mean, is there anything specific that      18 you're relying on saying that they should have      19 told you, or you just think out of fairness to you      20 they should have told you?</p> <p>21 A. Just out of fairness to me.</p> <p>22 Q. Okay. You mentioned about Gloria Robinson      23 saying something about asking or was going to ask  <b>ALABAMA COURT REPORTING, INC.</b>  <b>www.alabamareporting.com 877.478.DEPO (3376)</b></p> <p>138:01 or was going to reassign Ms. Key.</p> <p>02 Do you remember that testimony?</p> <p>03 A. I do.</p>
8	138:12 - 139:19	<p>138:12 Q. Was anyone else present when that      13 statement was made?</p> <p>14 A. I don't recall.</p> <p>15 Q. Tell me, as best as you can recall, what      16 Ms. Robinson said -- strike that.</p> <p>17 Before I ask that, do you know when she      18 made it? Was it on the 31st or the 1st or some      19 other date?</p> <p>20 A. Actually, she was expressing      21 dissatisfaction and mentioned it on the first day      22 as well as -- more so the second day.</p> <p>23 Q. Tell me, as best as you can recall, what  <b>ALABAMA COURT REPORTING, INC.</b>  <b>www.alabamareporting.com 877.478.DEPO (3376)</b></p> <p>139:01 she said on the first day. And I assume by the      02 "first day," you're mentioning the first day of      03 Ms. Key's actual employment?</p> <p>04 A. Right, the 31st.</p> <p>05 Q. Tell me what you can remember her saying      06 on the first day.</p> <p>07 A. Just basically that she didn't think she      08 was going to work out.</p> <p>09 Q. Anything else specific you can recall that      10 she said on the first day?</p> <p>11 A. Not at this date. That's the gist of it,      12 that she didn't think she was going to work out.</p> <p>13 Q. Did she say anything differently on the      14 second day?</p> <p>15 A. No. Once we got the call about -- or I      16 got the call from Latunya Howell and relayed to</p>

		<p>17 Robinson what was going on and after her meeting,      18 you know, she said that she felt it was best they      19 just reassign her. And, like I said, I echoed it.</p>
9	140:11 - 141:16	<p>140:11 looking at what's been marked as Plaintiff's      12 Exhibit 41 to the deposition here today.      13 Do you see that?      14 A. I do.      15 Q. That's your email; correct?      16 A. It is.      17 Q. And that's the email that ends with you at      18 the end saying, "I'm asking that she be moved to      19 another site"; correct? That's what it says?      20 A. That's correct, yes.      21 Q. And what is the time on that?      22 A. 8:50 a.m.      23 Q. And do you know what time Ms. Howell's  <b>ALABAMA COURT REPORTING, INC.</b>  <b>www.alabamareporting.com 877.478.DEPO (3376)</b>      141:01 shift would have started that morning?      02 A. 7:30.      03 Q. And what day was it that Ms. Howell      04 reached out to you and told you about what Ms. Key      05 said? Was it on the 1st or the 31st?      06 A. I believe it was the -- it was the 1st.      07 Q. Do you know what time of day it would have      08 been that Ms. Howell reached out to you?      09 A. It would have been after they left the --      10 our office. They deliver newspapers early in the      11 morning, and it would have been after they left      12 our office because they have to come over and pick      13 up any outgoing that we may have in our box.      14 Q. And are you able to give us an estimate      15 about what time of day that would have been?      16 A. It would have been prior to this email.</p>
10	141:19 - 144:07	<p>141:19 Q. All right. Back to -- can you tell me, as      20 best as you can recall, what Ms. Robinson said to      21 you on the 1st?      22 A. About what?      23 Q. About Ms. Key and anything about her being  <b>ALABAMA COURT REPORTING, INC.</b>  <b>www.alabamareporting.com 877.478.DEPO (3376)</b>      142:01 reassigned?</p>

02 A. As best as I can remember, she talked to  
03 her about -- or questioned her about her  
04 discrimination remark to Latunya Howell.

05 Q. And -- I'm sorry. My question may not  
06 have been clear. All that I'm asking you is what  
07 Ms. Robinson said to you.

08 A. This is what I'm talking about.

09 Q. Okay. All right. Thank you.

10 A. So yes, she mentioned her, I guess,  
11 discussion with her once they brought her back  
12 down there. She may -- honestly, I can't say  
13 everything, but I know she mentioned her meeting  
14 in the conference room with her.

15 Q. Anything else you can recall her saying?

16 A. Not -- no.

17 Q. Okay. You mentioned at the beginning --  
18 well, at least it was the beginning of my notes.  
19 So early in your testimony today you told us about  
20 a number of policies of HM- -- it was either HMMA  
21 or HEA that applied to the Dynamic employees.

22 Do you remember that conversation? You  
23 mentioned about drug screening and weapons and

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143:01 alcohol and a number of different policies.

02 A. It applies to everybody.

03 Q. Okay. And whose policies were you  
04 alluding to when you were referring to those  
05 policies?

06 MS. BROWN: Object to form.

07 A. HMMA.

08 Q. HMMA's?

09 A. Yes.

10 Q. Okay. Would the grooming or appearance  
11 standards of HMMA also apply?

12 MS. BROWN: Object to form.

13 A. I don't know anything about HMMA's current  
14 grooming. You mean current or back then?

15 Q. Back then.

16 A. So the -- their policy which I had reduced  
17 to our policy -- or HEA's policy applied to  
18 security personnel.

19 Q. Because I was just wondering when you were

		<p>20 talking about all those policies why you did not      21 mention the grooming policy that would have      22 applied.</p> <p>23 Is that because --</p> <p style="text-align: center;">ALABAMA COURT REPORTING, INC.  <a href="http://www.alabamareporting.com">www.alabamareporting.com</a> 877.478.DEPO (3376)</p> <p>144:01 MS. BROWN: Object to form.</p> <p>02 Q. -- it was not an HMMA policy or...</p> <p>03 A. It was because that policy was specific to      04 the security department, which is, at the time,      05 back in -- when I was hired, that was a security      06 department, which it was my understanding was      07 separate from general affairs.</p>
11	147:02 - 147:06	<p>147:02 Q. Did any HMMA employee ever tell you that      03 HMMA had an issue with black people wearing      04 dreadlocked hairstyles?</p> <p>05 A. I never heard that. It was never told to      06 me.</p>
12	156:08 - 156:12	<p>156:08 Q. Can you recall anything more specific that      09 Ms. Robinson said about Ms. Key's pregnancy other      10 than generally that she was concerned about her      11 ability to do the lifting in the mail room?</p> <p>12 A. That's basically it.</p>